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June 17, 2022

VIA ECF

Hon. Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Debora Bayne, et al. v. NAPW, Inc., et al.*
18-CV-3591 (MKB)(RER)

Dear Chief Judge Brodie:

This firm represents Named Plaintiff Bayne, Opt-in Plaintiffs, and the Class (collectively “Plaintiffs”) in the above referenced wage and hour litigation. Plaintiffs submit this joint letter to advise the Court on the status of this Class and Collective action along with the parties’ proposed schedule moving forward.

The deadline for putative FLSA Opt-in Plaintiffs to file consent to join forms is June 20, 2022. Although Plaintiffs seek additional class-wide discovery relating to damages, the parties have conferred and agreed that moving for summary judgment, prior to conducting additional damages discovery, is the most efficient and cost-effective course of action. Both parties intend to move for summary judgment on liability. Pre-motion conference letters were previously submitted by both parties in December 2020. See Docket Nos. 77-80. The parties are prepared to submit new pre-motion conference letters at the Court’s request, or alternatively, enter into the following requested summary judgment briefing schedule:

Summary Judgment Moving Papers	August 24, 2022
Opposition Papers	September 23, 2022
Reply Brief	October 7, 2022

The parties will serve and file the motion papers in accordance with Your Honor’s preferences set forth in Rule 3(D) of her Individual Rules of Practice.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/Jack L. Newhouse, Esq.

cc: Johner T. Wilson III, Esq. (via ECF)